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Superior Court of The State of California  
County of Sacramento

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| SARA H. JACKSON,  Plaintiff,  v.  ABC INCORPORATED, a California corporation,  Defendant. | Case No.: 34-2023-00335744  **Declaration of Sara H. Jackson In Reply To Plaintiff's Motion to Compel Further Responses to Special Interrogatories**  Hearing Info  Date: Wednesday, June 21, 2023 **|** 3:30 PM  Dept.: 54 **|** Hon. Richard K. Sueyoshi  Case Filed: May 29, 2023  Trial Date: Not Set |
| And Related Cross-Actions |  |

I, Sara H. Jackson, declare as follows:

1. I am an adult over the age of eighteen and managing partner of Danielson Kim Law Group, P.C., attorneys in this action for Plaintiff Sara H. Jackson and am licensed to practice in all superior courts in the State of California. I have personal, direct, and first-hand knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify under oath to the matters stated herein.
2. I submit this declaration in reply to Sara H. Jackson’s Motion to Compel Further Responses to Special Interrogatories and pursuant to Code of Civil Procedure section 585, subsections (b) and (d).
3. Xxxxx.

**Party List**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Name | Address | Phone | Fax | Email |
| ABC Incorporated | 5170 Golden Foothill Parkway El Dorado Hills, CA 95762 | (916) 520-3977 | None | Anthony@DanielsonKim.com |

1. xxxxx.

# Exhibits

1. Attached hereto[[1]](#footnote-2) as **Exhibit A** is a true and correct copy of a grant deed transferring 100% legal record title to Jane Doe, recorded January 1, 2023.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: June 1, 2023 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Sara H. Jackson

A close-up of a document

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1. . Any bolded “**R**” number (e.g., **R1**, **R60-R71**) cited in this document correlates to a page or range in the Bates-numbered exhibits (large red numbers at bottom left and right corners of each page) attached hereto. [↑](#footnote-ref-2)